



State of Utah
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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May 15, 2002

CERTIFIED RETURN RECEIPT
7099 3400 0016 8895 5569

Anthony Christofferson
Geneva Rock Products, Inc.
P.O. Box 538
Orem, Utah 84059

Re: Third Review of Notice of Intention to Commence Large Mining Operations, Geneva Rock Products, Inc., Levan Gypsum Mine, M/023/016, Juab County, Utah

Dear Mr. Christofferson:

The Division has completed a review of your February 5, 2002, response to our January 2, 2002 technical review of Geneva Rock Products large mine permit application for the Levan Gypsum Mine, located in Juab County, Utah. After reviewing the latest information, the Division has the following comments that will need to be addressed before tentative approval may be granted. The comments are listed below under the applicable Minerals Rule heading. Please format your response in a similar fashion.

Bolded italic print denotes our review comments to your latest response. ***Bold and italicized*** comments will require additional information. Please address only the ***bold and italicized*** items in this review. You may send replacement pages to the original notice using redline and ~~strikeout~~, so we can easily see what changes have been made to the application. After the large mine notice is accepted, we will then ask that you send us two copies of the complete and corrected plan. Upon approval of the permit, we will return one complete copy of the application stamped "approved" for your records. Please provide a response to this review by June 17, 2002.

The Division will suspend further review of the Levan Gypsum large mine permit application until your response to this letter is received. We request a response within 30 days of your receipt of this review. If you have any questions in this regard please contact me, Lynn Kunzler, Tom Munson or Doug Jensen of the Minerals Staff. If you wish to arrange a meeting to sit down and discuss this review, please contact us at your earliest convenience. Thank you for your cooperation in providing the remaining information in a timely manner.

Sincerely,

D. Wayne Hedberg
Permit Supervisor
Minerals Regulatory Program

jb

Attachment: Review

cc: Brian McClelland, Price Office, Manti LaSal Forest

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THIRD REVIEW OF NOTICE OF INTENTION TO COMMENCE LARGE MINING OPERATIONS

**Geneva Rock Company
Levan Gypsum Mine**

**M/023/016
May 15, 2002**

THE ITALICIZED AND BOLDED COMMENTS NEED TO BE ADDRESSED

R647-4-106 - Operation Plan

Please indicate on the reclamation map the location of the quarry and access road soil stockpiles. (DJ)

This review comment was not addressed in Geneva Rock's response. (DJ)

Please explain how the soil that will be placed on the shoulders of the roads will be protected from erosion. Also explain how it will be protected during reclamation of the road. (DJ)

This review comment was not addressed in Geneva Rock's response. (DJ)

106.9 Location & size of ore, waste, tailings, ponds

Please show on the appropriate figure the location of berms and the sediment pond used for erosion and sediment control. (TM)

The response to this request was shown on Figure II-D and III-B. The applicant has shown these items on the figures listed above but has failed to provide enough drainage details to delineate how the drainage will get to the pond, given the scale and lack of topographic detail on these figures. The purpose of requesting this information was to help define the adequacy of the drainage controls for storm water from disturbed areas. Please provide some details of how the drainage will get to the storm water pond by a road side ditch, etc. and show where these structures are located and interconnected. (TM)

This deficiency was not addressed. The impoundment structure locations are not shown on a figure or map. This map should show the topographic contours and how these structures are interconnected

R647-4-107 - Operation Practices

107.2 Drainages to minimize damage

The operation plan describes the main drainage being moved to the east, but the grade remaining unchanged under section 110.2. Please provide the location of the rerouted drainage section on a map and describe what has been done to ensure its stability both during the operation phase and the post-mining phase when the pad will remain. The road to the pit also transects a drainage, therefore, please describe how these sites will be protected during mining and reconstructed following mining. (TM)

The response in section 107.2 has failed to provide enough details to describe why stabilization mat was chosen to protect the reclaimed section of the disturbed channel and how it would be installed. The Division prefers riprap to stabilization mat as a permanent solution to erosion. A commitment to a good gradation of angular, hard, 6"-24" riprap installed correctly to

engineering guidelines would be a more appropriate response to this concern, unless bedrock is exposed in the area of disturbance and no protection is needed. The reclaimed channel must meet the upstream and downstream channel profiles. Please make the appropriate corrections to the plan or provide other alternatives. Also show on a figure what areas will be treated. (TM)

The operator's response does not provide an adequate figure that shows what area will be impacted. The Division requested that the operator put language in the plan committing to a good gradation of angular, hard, 6"-24" riprap installed correctly to engineering guidelines, unless bedrock is exposed in the area of disturbance and no protection is needed. (TM)

107.3 Erosion control & sediment control

The plan talks about a pond on the lower pad and berms at appropriate places. The Division does not feel this is unacceptable, but would like to have the location of these structures shown on a map and a description of the size of the berms in the plan. (TM)

In concept, the overall plan does not completely and clearly explain how disturbed area drainage will be treated. Although it appears that the drainage will be routed to the sediment pond, it is still unclear how this will be implemented on the ground and what the size of the pond will be. Will it have a protected inlet and outlet or is it sized to handle all storm water from the pad and road prior to discharge? If discharge is expected, then a Discharge Permit is required from the Department of Environmental Quality, Water Quality Division. Please provide more explanation and better drainage details, so the Division can determine that the storm water runoff from disturbed areas is being properly treated. (TM)

Please address the above questions about riprap protection of the inlet and outlet of the pond. The plan also does not show the location of both structures on a figure that also shows topography. The reason why this is requested, is so we can verify the amount of drainage area draining to the ponds. The mine, when in operation, should provide containment and treatment of sediment laden runoff. Following reclamation, if any impoundments remain, they must be self-draining and mechanically stable, unless shown to have sound hydrologic design and be beneficial to the post mining land use. Please provide this figure and information as requested. (TM)

R647-4-110 - Reclamation Plan

Please describe the proposed reclamation treatments for the floors of the two quarry excavations.

Please show the location of the sediment pond which is proposed to remain unreclaimed on the reclamation map. Please describe how soil will be placed on the highwall benches and the method of seeding for these benches. (AG)

The location of the sediment pond was shown on the maps in the revised plan. (DJ)

The reclamation treatment proposed for the two quarry pit floors was not addressed in this section. The method used to place the soil on the benches needs to be addressed. (DJ)

This review question was not addressed in Geneva Rock's response. (DJ)

The revised plan, under the heading Reclamation of drainage, states that the pad will remain after mining ceases. Under R647-4-110.3, the revised plan states that "the pad will be regraded and will then also be reclaimed". Please correct the inaccurate statement. (DJ)

R647-4-111 - Reclamation Practices

111.2 Reclamation of natural channels

See comments under R647-4-107.2.

See response under 107.2 for additional information needed to complete the permit. (TM)

111.9 Dams & impoundments left self draining & stable

If the pond and pad will remain in place following reclamation of the mine, please describe how it will be maintained and who will assume responsibility. A variance to this section will need to be requested under R647-4-112.

The revised plan states that the pond will be reclaimed. Operator's response satisfies the regulatory requirements of this section of the rule. (TM)

The latest revised plan, under the heading "Impoundments, pits, and ponds to be left", states that the sediment pond will remain after mining ceases. Please provide the necessary information to justify this request.(TM)

R647-4-112 - Variance

The operator has requested a variance to the pad area based on a future land use of an equestrian park and camping area. The Division cannot grant this Variance until we are assured that the proposal will actually occur upon final reclamation. Please calculate full pad reclamation costs in your bond estimate at this time. (TM)

It still remains unclear in the plan what the operator's intentions are related to the pad. Please clarify this response. (TM)

R647-4-113 - Surety

The revised plan states that all topsoil will be placed using a trackhoe, but the surety does not reflect the cost of a trackhoe in the cost calculations. Please include this additional cost in the surety estimate. (DJ)